

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FRANKLYN DEVON PRILLERMAN

Plaintiff

v.

CITY OF PHILADELPHIA, ET AL.,

Defendant

CIVIL ACTION NO.

13-1414

JURY TRIAL DEMANDED

FILED

MAR - 6 2014

MICHAEL E. KULZ, Clerk
By _____ Dep. Clerk

PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO PARTIAL DISMISS

1. Plaintiff asserts that he has included enough facts to state a claim for relief that is plausible on its face and has done so for each element of his claim in his initial claim and amended claim. Plaintiff asserts that he is a layman in the law and ask the Court's kind consideration of this fact. As a matter of law Plaintiff relies on Bell Atlantic v. Twombly, 550 U.S. 544, 570, 127 S. Ct. 1995 (2007) and Phillip v. County of Allegheny, 515 F3d 224, 234 (3rd Circuit 2008)

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FRANKLYN DEVON PRILLERMAN

Plaintiff

CIVIL ACTION NO.

v.

13-1414

CITY OF PHILADELPHIA, ET AL.,

JURY TRIAL DEMANDED

Defendant

CERTIFICATE OF SERVICE

I, Franklyn Prillerman, do hereby certify that on this date a correct copy of Plaintiff's response to Defendant's MOTION TO DISMISS sent via first class mail to:

Regina A. Lawrence
City of Philadelphia Law Department
Civil Rights Unit
1515 Arch St, 14th fl
Philadelphia, PA 19102

Date: February 7, 2014

Respectfully submitted,

/s/ Franklyn D. Prillerman
123 E. Pomona St.
Philadelphia, PA 19144

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FRANKLYN DEVON PRILLERMAN

Plaintiff

CIVIL ACTION NO.

v.

13-1414

CITY OF PHILADELPHIA, ET AL.,

JURY TRIAL DEMANDED

Defendant

ORDER

AND NOW this day _____ of _____, 2014, upon consideration of Defendant's, the City of Philadelphia, Motion to Dismiss, and any response thereto, it is hereby ORDERED and DECREED that the Motion is DENIED.

BY THE COURT;

Rufe, J.